

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 23-80095-CR-SINGHAL**

**UNITED STATES OF AMERICA**

**vs.**

**JERRY K. SEAL,**

**Defendant.**

\_\_\_\_\_ /

**FACTUAL PROFFER**

The United States of America and Jerry K. Seal (hereinafter referred to as the “Defendant” or “Seal”) agree that if this case had gone to trial, the United States would have proven the following facts beyond a reasonable doubt:

1. SEAL is a registered sex offender, having been previously convicted on October 22, 2015, in Broward County State Court for sexual performance by a child, in violation of Florida State Statutes 827.071(5)(a) and 775.0847(2), and computer pornography, in violation of Florida State Statute 847.0135(2), and was sentenced to Community Control/Sex Offender Probation. Case#: 13-11800CF10A; Judge Andrew Siegel.

2. On November 21, 2022, Broward County Sheriff’s Office South Florida Internet Crimes Against Children Taskforce received CyberTip #136047014 which advised that PayPal had identified a suspicious Australian PayPal account that was making payments to Philipino accounts and might be related to child pornography. A review of one of the Philipino receivers of payments, revealed her account received payments from PayPal account #2168125436163714637, registered to SEAL of North Lauderdale, Florida.

3. Per Florida Statute, SEAL is required to register a permanent residential address

and all internet identifiers. Florida Department of Law Enforcement records revealed SEAL has registered his permanent address as 10498 S 228th Lane, Boca Raton, FL 33428, the email address jerry@uniquerabbit.com, and phone number 954-821-3972. SEAL worked for Unique Rabbit, a company in South Florida that makes oversized vanity items for sporting and other large events.

4. On November 29 and 30, 2022, PayPal responded to subpoenas for SEAL's account. The return included his date of birth, social security #, phone number 954-821-3972, and email address: jerrySEAL07@gmail.com, the account having been created on July 7, 2021. The account information included the address 10498 S. 228<sup>th</sup> Ln., Boca Raton, FL 33428. The record indicated that SEAL had sent a total of \$3,461.44 and received \$0, that the account was secured by a Wells Fargo Visa Debit Card ending in 36945 and an Amex prepaid card ending in 55049, and all payments were all made to accounts in the Philippines. Finally, PayPal provided IP logs from July 1, 2022, through October 6, 2022, almost all of which were the same IP address: 76.108.143.178.

5. A subpoena to Google for SEAL's jerrySEAL07@gmail.com account produced records on November 28, 2022. The account was registered to SEAL and created on November 12, 2020, with a recovery number of **954-821-3972**. Credit cards attached to the account included the Wells Fargo debit card and Amex card noted above. The account was logged in numerous times beginning at least as far back as March 1, 2022, through November 27, 2022, from IP address 76.108.143.178.

6. A search warrant for the contents of the JerrySEAL07@gmail.com was issued by a Broward County Court Judge on November 29, 2022. Google responded with "Device Data" which identified a Motorola G-Stylus device used by this Google account. Google also identified another Google account, jerry09191963@gmail.com as the recovery email address for this

account, and likewise not registered with the State of Florida as per SEAL's Sex Offender requirements.

7. A subpoena to Google for SEAL's jerry09191963@gmail.com account identified the account created with the name "Dirty Rook" on December 21, 2015, with recovery e-mail jerry@uniquerabbit.com and phone number 954-821-3972. Numerous login details were obtained from March 1, 2022, through December 1, 2022, including from IP address 76.108.143.178. It should be noted that the numbers used in the email jerry09191963@gmail.com reflect SEAL's date of birth.

8. Comcast responded to a subpoena request that IP address 76.108.143.178 was assigned from November 11, 2022, through May 9, 2023, to SEAL's stepfather at 10498 S. 228<sup>th</sup> Ln., Boca Raton, FL 33428.

9. A search warrant return for the jerry09191963@gmail.com account revealed the same device information as the previous Google search warrant as well as several administrator-type emails from the application "Skype" to user email address jerry09191963@gmail.com.

10. On February 23, 2023, a Palm Beach County Court Judge issued an arrest warrant for SEAL for failure to register his email addresses as required by Florida law. On February 28, 2023, SEAL was arrested at his parent's residence located at 10498 S. 228<sup>th</sup> Lane, Boca Raton, Florida where he was living. Post-*Miranda* SEAL confessed to not registering his email addresses with F.D.L.E.'s Sexual Offender program. During SEAL's arrest at his parents' Boca Raton residence, Florida Department of Corrections–Probation and Parole, while on scene, searched the residence and found a Motorola cellular phone and Samsung tablet belonging to SEAL. Probation found the Samsung tablet in the bathroom that SEAL shared with his brother inside the cabinet under the sink.

11. On March 3, 2023, a Palm Beach County Court Judge issued a search warrant for the devices seized from SEAL's residence for evidence related to his failure to register email addresses. The search allowed investigators to search his photos and videos of screenshots or other evidence that he had used email addresses not registered with FDLE. Following a forensic extraction of the tablet, investigators discovered one video in the photo's gallery application entitled, "XRecorder\_26022023\_001517.mp4" (hereinafter "the Video"). The video title represented the date and time of the recording, to wit: February 26, 2023, at 12:15:17am.

12. The Video is a 6 minute and 34 second screen recording of a live video chat between a female user (hereinafter "User 1") and a person with the username "Rook." The video/chat interface is from the application Skype. The username "Rook" is uniquely similar to the username "Dirty Rook", the username for jerry09191963@gmail.com. The Video also included the top of SEAL's face from his eyes to the top of his head in a small window on the upper-right corner of the screen, confirming he was live chatting with User 1. While engaging in the live video chat it SEAL purposely tried to hide his face. The background in the Seal-window is his bedroom in his Boca Raton residence.

13. The Video revealed a nude female child, approximately 4-6 years old, playing around and inside a metal tub of water. At times, the child bent down to expose her face, however, the focus on the video was the child's pubic area and legs. At one point during the Video, the child squatted down in the metal tub and touched her vagina while looking up at the camera. The child was olive skinned and appears Asian/Filipino in decent.

14. During the Video, the typed chat between "Rook" and User 1 that occurred simultaneously appeared on the screen and was captured as follows:

|        |   |
|--------|---|
| User 1 | wait Did you see she dance naked See Pussy her Ok I will take |
|--------|---|

|        |   |
|--------|---|
|        | a pic of her pussy See babe U like her Dance naked hahaah |
| Rook   | Yes   |
| User 1 | Haha hope you like ahaha U hard now                       |
| Rook   | Yes   |
| User 1 | Wow nice Mmmmmm   |
| Rook   | Thank you   |
| User 1 | YW Babe"  |

15. From the search warrant return for jerry09191963@gmail.com law enforcement identified that SEAL used a Remitly online account to send money aside from PayPal. A review of Remitly records as a result of a subpoena for the account assigned to SEAL, with his date of birth, address of his wife in North LAUDERDALE, FL, 954-821-3972 phone number, jerry09191963@gmail.com email address, revealed that SEAL sent \$2999.00 via Remitly payments to 16 accounts in the Philippines, in addition to over \$3000 sent to similar accounts in the Philippines through PayPal. It should also be noted that according to the Remitly transaction records, a transaction dated February 23, 2022, for \$47.46 was made by SEAL to a recipient with a nearly identical name as User 1 above and on the same date that the Video was received by SEAL.

16. SEAL's mother advised law enforcement that the tablet that was seized on February 28, 2023, was SEAL's new/newer tablet and that he had an older one, but she did not know what happened to it.

17. On March 14, 2023, a Palm Beach County Court Judge issued a search warrant to for the "Rook" Skype account. On April 27, 2023, Microsoft, the owner of Skype, responded to the search warrant and provided the account name of "Dirty Rook" was created on June 15, 2018, with email address jeryr09191963@gmail.com. The Skype records also included more than 25,000 messages/images/videos/calls exchanged with hundreds of other users, including more than 1000

with User 1. Their conversation began at least as early as October 7, 2022, in which SEAL offered to pay User 1 via PayPal for live video sex including “1k for 15 minutes.” On December 29, 2022, SEAL told User 1 he wanted more than just her live sex shows, offering that he “like[s] young”. When User 1 said she had a 1-year-old, SEAL offered that is too young. User 1 then said she had a 5-year-old, to which SEAL said, “ok” but that he is really looking for a “6-12” year old. User 1 said that her 5-year-old was too shy anyway. User 1 offered her sister who was 12 years old for “2k”. As time went on, SEAL inquired several times about User 1’s 5-year-old girl. Beginning on February 21, 2023, User 1 offered SEAL to see the 5-year-old girl’s pubic region “up close” for “2500”.

18. The next chat on February 26, 2023, included that which was seen in the Video, with a log date & time of February 26, 2023, at 05:15 UTC (which translates to 12:15 A.M. EST – the exact time included in the title of the video). Skype also produced only *one* IP address used by the Rook account, the same 76.108.143.178 IP, showing that the user logged in on February 26, 2023, at 01:40:36 PST, just a few hours after the time-name on the aforementioned video. The last chat with User 1 for that day ends on February 26, 2023, at 5:30:05 and begins again the next day.

19. Based on these facts and other information known to the parties, SEAL agrees that, had this case gone to trial, the government would have proven beyond a reasonable doubt, as to Count 1 of the Indictment, that SEAL received child pornography in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1), on February 26, 2023, such that:

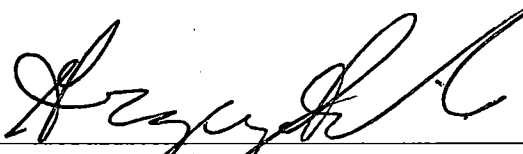
- a. the Defendant knowingly received an item or items of child pornography;
- b. the item or items of child pornography had been received using any means or facility of interstate or foreign commerce or had been mailed, or shipped or

transported in or affecting interstate or foreign commerce by any means, including by computer;


- c. when the Defendant received the items, the Defendant believed the items were or contained child pornography; and
- d. when the defendant received the child pornography, he had previously been convicted in the State of Florida for sexual performance by a child, in violation of Florida State Statutes 827.071(5)(a) and 775.0847(2), and computer pornography, in violation of Florida State Statute 847.0135(2).

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

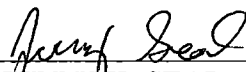
Date: 7/12/23

By:   
GREGORY SCHILLER  
ASSISTANT UNITED STATES ATTORNEY

Date: 7/12/23

By:   
ALLARI DOMINGUEZ  
ASSISTANT FEDERAL PUBLIC DEFENDER

Date: 7/12/23

By:   
JERRY K. SEAL  
DEFENDANT